

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of  
Telecommunications and Energy on its own motion  
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon  
New England Inc., d/b/a Verizon Massachusetts'  
provision of Special Access Services.

D.T.E. 01-34

**AT&T'S SECOND SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

## INFORMATION REQUESTS

1. For each subpart below, please provide the requested data as of January 31, 2001 and December 31, 2001 (or, if data are not available with respect to such dates, please use the nearest time period for which data are available).
  - a. State the number and locations of Carrier Account Team Centers (CATC) serving the Verizon North territory. For each CATC in the Verizon North territory, state how Verizon determines which type or number of Massachusetts orders the CATC will handle; and state how Verizon determines staffing levels to meet that demand.
  - b. State the number and locations of Overall Control Offices (OCO) serving the Verizon North territory. For each OCO in the Verizon North territory, state how Verizon determines which type or number of Massachusetts orders the OCO will handle; and state how Verizon determines staffing levels to meet that demand.
  - c. For each CATC and OCO listed above, provide
    - i. the number of employees associated with that center or office, broken down by categories (*e.g.*, Reps/Agents, technicians, designers, account managers, sales managers, sales representatives, etc.).
    - ii. a general description of the type of work performed by each category of worker.
    - iii. an organization chart up to Group President level.
  - d. For each CATC and OCO listed above, provide the number of customer accounts associated with that center or office, and state how Verizon determines which customers will be served by that CATC and OCO.
  - e. Refer to the response to subpart c, above, in which the number of account managers is provided.
    - i. Are all wholesale account managers associated with a CATC, or are some associated with an OCO? Describe the responsibilities of a Verizon wholesale account manager. Provide any and all supporting documentation, including organization chart through Verizon Group President.
    - ii. Are all retail account managers associated with an OCO, or are some associated with a CATC? Describe the responsibilities of a Verizon retail account manager. Provide any and all supporting documentation, including organization chart through Verizon Group President.

- f. Refer to the response to subpart c, above, in which the number of sales representatives is provided.
  - i. Are all wholesale sales representatives associated with a CATC, or are some associated with an OCO? Describe the responsibilities of a wholesale sales representative. Provide any and all supporting documentation, including organization chart through Verizon Group President.
  - ii. Are all retail sales representatives associated with an OCO, or are some associated with a CATC? Describe the responsibilities of a retail sales representative. Provide any and all supporting documentation, including organization chart through Verizon Group President.
- g. Refer to the response to subpart c, above, in which the number of technicians is provided.
  - i. Describe the responsibilities of a technician employed in a CATC. Describe the responsibilities of a technician employed in an OCO.
  - ii. Please state whether the responsibilities of a technician in a CATC or OCO includes field installation, repair and/or maintenance and, if not, what organization handles those functions. Provide any and all supporting documentation, including a Verizon organization chart for field installation and repair technicians through the Group President level.
- h. For each CATC and OCO identified in response to subpart a and b above, state the percentage of the circuits identified in response to WCOM/ATT-VZ 1-3 that are handled by that CATC or OCO.
- i. For each CATC and OCO identified in response to subpart a and b above, state the percentage of that CATC's or OCO's total volume that is represented by Massachusetts circuits.
2. Please explain what Verizon means by "building facilities" or "constructing facilities" in its note on the Ordering Process Flow Charts attached to its Revised Panel Testimony. Provide examples of Verizon "building facilities" or "constructing facilities".
3. Please refer to the Wholesale and Retail Ordering Process Flow Charts and the RequestNet functions which determine whether facilities exist.
  - a. Please modify Verizon's response to WCOM/ATT-VZ 1-3 (retail and wholesale) to exclude the number of circuits for which facilities needed to be built.

- b. Please modify Verizon's response to WCOM/ATT-VZ 1-4 (retail and wholesale) to exclude the number of circuits for which facilities needed to be built.

Please provide an explanation as to how Verizon used RequestNet or any other system/database to arrive at the requested modified data results.

- 4. Please refer to the Wholesale and Retail Ordering Process Flow Chart.
  - a. Please state whether a wholesale Service Order (namely, the order created after Verizon conducts a facilities check through RequestNet) contains the customer desired due date specified on the ASR by the carrier. If your answer is yes, please describe where on the Service Order such information is contained or how Verizon employees reviewing the Service Order would locate such information. If your answer is no, please explain why such information is not contained on the Service Order.
  - b. Please state whether a wholesale Service Order contains the committed due date determined by Verizon. If your answer is yes, please describe where on the Service Order such information is contained or how Verizon employees reviewing the Service Order would locate such information. If your answer is no, please explain why such information is not contained on the Service Order.
- 5. Please refer to the Wholesale Ordering Process Flow Chart.
  - a. Please state whether a wholesale FOC contains the customer desired due date specified on an ASR by the carrier. If your answer is yes, please describe where on the FOC such information is contained or how anyone reviewing the Service Order would locate such information. If your answer is no, please explain why such information is not contained on the FOC.
  - b. Please state whether a wholesale FOC contains the committed due date by Verizon. If your answer is yes, please describe where on the FOC such information is contained or how anyone reviewing the Service Order would locate such information. If your answer is no, please explain why such information is not contained on the FOC.
- 6. Verizon states in its Revised Panel Testimony: "Verizon MA has confirmed that the retail (*i.e.*, end user) data provided in its November 30, 2001, reply to WCOM/ATT 1-22 does not relate to special access services. Rather, it reflects the special services retail data used to develop the performance metric PR 6-01 (Percent Installation Troubles Reported Within 30 Days) contained in Verizon MA's C2C reports." (page 35).

Please provide a detailed explanation as to why Verizon's original "incorrect" response is not responsive to WCOM/ATT 1-22 which stated:

“For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of installation trouble reports received; and
- (b) the amount of credits or payments issued to the various categories of customers.”

Stated another way, please explain why the special services retail data used to develop the performance metric PR 6-01 (Percent Installation Troubles Reported Within 30 Days) contained in Verizon MA’s C2C reports is not the data requested in WCOM/ATT-VZ 1-22. Please describe in detail any differences between the data provided in the November 30, 2001 response to WCOM/ATT-VZ 1-22 and the data provided in Verizon’s second supplemental reply to DTE-VZ 4-1.

7. Please provide the 2001 special access ARMIS reports for Massachusetts as filed by Verizon with the FCC. (*See* DTE-VZ 4-31).
8. Please update Verizon’s responses to WCOM/ATT-VZ 1-2, 1-3, 1-4, 1-5, 1-6, 1-7, 1-14, 1-18, 1-22, 2-3 and 2-5 with the most current wholesale and retail data available.
9. Refer to the November 30, 2001 supplemental reply and December 21, 2001 errata to supplemental reply to WCOM/ATT-VZ 1-3. A difference exists between the number of retail intrastate DSO circuits listed in those two replies. For example, in January 2001, Verizon’s supplemental reply states that 778 DSO circuits were completed, while Verizon’s errata to supplemental reply states that 2,074 DSO circuits (non-access) were completed in January 2001. Similarly, in February 2001, Verizon’s supplemental reply states that 820 DSO circuits were completed, while Verizon’s errata to supplemental reply states that 2,273 DSO circuits (non-access) were completed in February 2001. This pattern is consistent throughout the rest of the year’s data.

Refer to the explanation for this difference in Verizon’s response to WCOM/ATT-VZ 3-1(a) which states that “any changes in the previously filed intra-state (NON-ACCESS) retail data are the result of daily database updates to the Service Order Request Database (SORD) system based on completions from Verizon’s billing systems.” Also, please refer to WCOM/ATT-VZ 4-14 which states that “[f]or provisioning performance, Verizon MA tracks its performance at a service order level. Data is accumulated on a daily basis based on the prior day’s completions and is summarized weekly and monthly.”

Please explain the difference in the retail intrastate DSO circuits provided in the supplemental reply and errata to supplemental reply to WCOM/ATT-VZ 1-3. Please explain why billing updates in December 2001 affect data for January 2001. If the database update of the SORD system does not explain the difference, or does not completely explain the difference, please provide an explanation.

Respectfully submitted,

**AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.**

Mary E. Burgess  
111 Washington Ave  
Room 706  
Albany, New York 12210  
(518) 463-3148 (voice)  
(518) 463-5943 (fax)

---

Jeffrey F. Jones, Esq  
Kenneth W. Salinger, Esq.  
Jay E. Gruber, Esq.  
Katherine A. Davenport, Esq.  
Palmer & Dodge LLP  
111 Huntington Avenue  
Boston, MA 02199  
(617) 239-0449

April 24, 2002